



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F.#2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

February 12, 2016

By ECF

The Honorable Joseph F. Bianco
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Philip Kenner and Tommy Constantine
Criminal Docket No. 13-607 (S-2) (JFB)

Dear Judge Bianco:

The government respectfully submits this letter to request a brief extension of time to respond to the defendant's post-trial motions. The government is diligently preparing its response but requests additional time due to the length of the record in this case and the nature of the defendant's claims. The government has conferred with defense counsel for both parties and the Court's deputy; defense counsel consent in this request and the parties jointly propose the following schedule: February 26, 2016 as the due date for the government's response; March 11, 2016 as the due date for the defendants' reply; and March 30, 2016 at 2:00pm for any oral argument on the motion.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

By: /s/
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cc: All counsel of record (by ECF)